

**IN THE UNITED STATES DISTRICT COURT FOR  
THE MIDDLE DISTRICT OF ALABAMA  
SOUTHERN DIVISION**

**CURLEY YOUNG,**

**Plaintiff,**

**vs.**

**HONEYWELL TECHNOLOGY  
SOLUTIONS, INC.,**

**Defendant.**

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**CASE NO:**

**1:06-CV-00563-SRW**

**MOTION FOR LEAVE TO FILE RECORDS UNDER SEAL**

COMES NOW Defendant Honeywell Technology Solutions, Inc. (“Honeywell”) and files its Motion for Leave to File Records Under Seal in accordance with Section 5 of the Protective Order entered by this Court on April 18, 2007. In support of this Motion, Honeywell would show the Court as follows:

1. Honeywell has simultaneously filed its Motion for Summary Judgment, Brief in Support of its Motion for Summary Judgment, and Evidentiary Submission with this Court.
2. Honeywell refers to certain confidential and private personnel documents for non-party individuals, who are employees of Honeywell, Robert Hadley, William Culpepper, and Christopher Hines (the “Non-Party Individuals”) in connection with its Motion for Summary Judgment and Brief in Support (the “Non- Party Personnel Documents”). Additionally, Honeywell refers to the Non-Party Personnel Documents in its Evidentiary Submission as being located at Tabs “L”, “M”, and “N”, but has not attached them as exhibits due to confidentiality and privacy concerns.
3. The Non-Party Personnel Documents refer to rate of pay, performance evaluations,

disciplinary actions, termination reasons, and other sensitive information for the Non-Party Individuals. Honeywell ordinarily and customarily considers such information to be confidential, and does not desire to unduly expose the Non-Party Individuals' sensitive and private personnel information to the public.

4. The Non-Party Personnel Documents referenced in Honeywell's Motion for Summary Judgment, Brief in Support, and Evidentiary Submission are important to establishing and supporting the basis for Honeywell's Motion for Summary Judgment, should be considered by the Court in ruling on the Motion for Summary Judgment, and should be part of the Court's record.

WHEREFORE, PREMISES CONSIDERED, Honeywell respectfully requests that this Court enter an Order allowing Honeywell to file the Non-Party Personnel Documents under seal. If this Motion is granted, Honeywell will submit the records in a sealed envelope to the clerk of court and to opposing counsel within five (5) days after entry of the Order granting this Motion.

Respectfully submitted,

s/Sandra B. Reiss  
Sandra B. Reiss (ASB-3650-S80S)  
Ryan M. Aday (ASB-3789-A54A)  
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*Counsel for Defendant, Honeywell*  
*Technology Solutions, Inc.*

**CERTIFICATE OF SERVICE**

I hereby certify that on this 1<sup>st</sup> day of May, 2007, I filed the foregoing Motion to File Records Under Seal via this Court's CM/ECF filing system, and that an electronic notice and complete copy of the foregoing Motion will be served to Jeffrey W. Bennitt pursuant to this Court's electronic filing service.

/s/Sandra B. Reiss

Sandra B. Reiss (ASB-3650-S80S)

Ryan M. Aday (ASB-3789-A54A)

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